

BURLE INDUSTRIES, INC. 1000 New Holland Avenue
Lancaster, PA 17601-5688 Telephone: (717)295-6000

BURLE**ORIGINAL
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Date: **October 20, 1992** Time: **12:43 PM**
Send To: **John A. Reed, Senior Engineer**
Company: **FCC, Office of Engineering and Technology**
Fax Number: **202/653-8773**
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From: **Kirk Jenne, Esq.**
Location: **Lancaster, PA**
Fax Number: **717/295-6098**
Office Tele No: **717/295-6996**

Number of Pages (Including this sheet): **3**

Re: **FCC ET Doc. No. 92-152; Burle Industries, Inc. Comments**

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BURLE INDUSTRIES, INC. | 1000 New Holland Ave. | Lancaster, PA 17601-5688 | Telephone (717) 295-6996



Kirk Jenne
Vice President & General Counsel

October 20, 1992

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Federal Communications Commission
Office of the Secretary

John A. Reed, Senior Engineer
Office of Engineering and Technology
Federal Communications Commission
2025 M Street, N.W., Room 7122C
Washington, DC 20554

Re: FCC ET Doc. No. 92-152: BURLE INDUSTRIES, INC. Comments

Dear Mr. Reed:

I am enclosing written comments of BURLE INDUSTRIES, INC. dated October 16, 1992. As you can see, we support the FCC's proposed Amendment of Part 15.

If you have any questions regarding our comments, please feel free to telephone the undersigned or Mr. Tony Bianca. Mr. Bianca's direct dial telephone number is 717/295-6891.

Very truly yours,

A handwritten signature in dark ink, appearing to read "Kirk Jenne", is written over a horizontal line. The signature is fluid and cursive in style.

Kirk Jenne

Enclosure

Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, DC 20554

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Federal Communications Commission
Office of the Secretary

In the Matter of

Revision of Part 15
of the Rules to harmonize
the standards for digital
devices with international standards.

ET Docket No. 92-152

COMMENTS OF BURLE INDUSTRIES, INC.

BURLE INDUSTRIES, INC. of Lancaster, Pennsylvania hereby respectfully submits Comments in response to the above-entitled Notice of Proposed Rule Making (NPRM), dated July 30, 1992. The proceeding was instituted to revise Part 15 of the Federal Communications Commission's ("FCC") Rules governing the regulation of unlicensed RF devices in the United States.

The proposal is intended to permit manufacturers of digital devices to demonstrate their compliance with either FCC requirements or international standards for radio frequency emissions. The objective of this proposal is to ensure that U.S. manufacturers have reasonable opportunities to compete fairly and effectively in the international marketplace.

BURLE INDUSTRIES, INC. agrees with the FCC's Proposal, ET Docket No. 92-152, to amend Part 15 to permit U.S. manufacturers of digital devices to demonstrate compliance with either FCC RF requirements or the CISPR International Standards. This would ease some of the burden of excessive testing for companies in a global market. Any options to reduce testing time and cost will benefit U.S. industry, especially when it is competing in international markets.

Respectfully submitted,

Burle Industries, Inc.

By: 

Carlton L. Rintz

Title: Executive Vice President

Address: 1000 New Holland Avenue
Lancaster, PA 17601-5688Date: OCT 17 1992

BEFORE THE
FEDERAL COMMUNICATIONS COMMISSION
WASHINGTON, DC 20554

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OCT 22 1992
Technical Standards Branch
Authorization and Evaluation Division

In the matter of)
Revision of Part 15 of the Rules)
to harmonize the standards for digital)
devices with international standards)

Notice of Proposed
Rulemaking; Request
for Comments
ET Docket No. 92-152

Comments
of

AMADOR, a TUV Product Service Company
348 Bench Street
PO Box 270
Taylors Falls MN 55084-0270

21 October 1992

BEFORE THE
FEDERAL COMMUNICATIONS COMMISSION
WASHINGTON, DC 20554

In the matter of)	
Revision of Part 15 of the Rules)	Notice of Proposed
to harmonize the standards for digital)	Rulemaking; Request
devices with international standards)	for Comments
		ET Docket No. 92-152

INTRODUCTION

AMADOR, a TUV Product Service company, hereby submits its Comments in the above-captioned matter.

AMADOR is an independent testing laboratory that specializes in Electromagnetic Interference testing and has four Open Area Test Sites registered with the Commission. AMADOR is active in both national and international testing and in the corresponding standards development.

COMMENTS

AMADOR applauds the Commission's effort to harmonize the FCC Part 15 standards with such well known international standards as CISPR 22.

AMADOR believes that it is possible to have one electromagnetic emission standard for each class of equipment that would be suitable for worldwide marketing. That is, one test on each type of equipment should allow the product to comply with all international regulations on electromagnetic emissions such that the product can be marketed anywhere in the world.

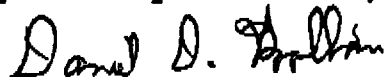
AMADOR recommends that the CISPR 22 Powerline conducted emission limits be adopted as presently published in the 1985 version of CISPR Recommendation 22. AMADOR further recommends that two conducted emission tests be performed; one with the unit running on 60 Hz power and the other with the unit running on 50 Hz power. The test with the 60 Hz unit would satisfy United States FCC criteria while the test on the 50 Hz unit would satisfy countries using that power distribution network.

AMADOR recommends that the CISPR 22 radiated emission limits (1985 version) be adopted from 30 to 1000 MHz and that above 1000 MHz the FCC Part 15 limits and test methods shall apply. AMADOR believes that only one radiated emission test is needed on a type test and that the unit can be run on 60 Hz for the radiated emission test and the results are directly transferable to the 50 Hz environment.

AMADOR recommends a 10-meter antenna distance for Class A (Commercial) equipment and a 3-meter antenna distance for Class B (Domestic) equipment.

AMADOR further notes that the Japanese VCCI organization has recently changed its test site regulations (October-1992) and that site registration for the VCCI will have to comply with the basic criteria found in ANSI C63.4-1991. The transition time for this change is basically three years ending on December 31, 1995. AMADOR urges the Commission to consider this date as the final transition date to CISPR 22 limits and regulations since this date is also the final date for full effectivity of the European Economic Community's EMC Directive.

Respectfully Submitted,



Daniel D Hoolihan
Chief Operating Officer
AMADOR - A TUV Product Service Company